



1 Plaintiff Tatyana Rotkin (“Plaintiff”) and defendant Goldman Sachs Bank  
2 USA (“GS Bank” and together, with Plaintiff, the “Parties”), by and through their  
3 undersigned counsel, hereby stipulate as follows:

4 WHEREAS, on July 6, 2022, Plaintiff filed the Complaint in the United States  
5 District Court for the Eastern District of California (Dkt. No. 1);

6 WHEREAS, GS Bank was served with the Complaint on July 12, 2022;

7 WHEREAS, on August 2, 2022, the Parties previously agreed to extend the  
8 deadline to respond to the Complaint by twenty-one (21) days, pursuant to L.R.  
9 144(a), to and including August 23, 2022 (Dkt. No. 5);

10 WHEREAS, the parties are discussing arbitration and a potential stipulation in  
11 an effort to avoid motion practice and also discussing settlement, and therefore the  
12 Parties have agreed to extend the date by which GS Bank must answer or otherwise  
13 respond;

14 WHEREAS, the Parties, through their respective counsel of record, have  
15 agreed to further extend the deadline to respond to the Complaint by seven (7) days,  
16 to and including August 30, 2022; and

17 WHEREAS, this stipulation is submitted in good faith and not for purposes of  
18 delay.

19 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between  
20 Plaintiff and GS Bank, through their respective counsel of record, that GS Bank shall  
21 have a further seven (7) day extension of time, to and including August 30, 2022, to  
22 file its response to the Complaint.

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1 Dated: August 23, 2022

STROOCK & STROOCK & LAVAN LLP  
ARJUN P. RAO  
SHERI GUERAMI

4 By: /s/ Sheri Guerami  
Sheri Guerami

6 Attorneys for Defendant  
DISCOVER BANK

8 Dated: August 23, 2022


PRICE LAW GROUP, APC  
YOUSSEF H. HAMMOUD

11 By: /s/ Youssef H. Hammoud  
Youssef H. Hammoud

13 Attorneys for Plaintiff  
TATYANA ROTKIN

14 IT IS SO ORDERED.

15 Dated: August 25, 2022

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17 MORRISON C. ENGLAND, JR.  
18 SENIOR UNITED STATES DISTRICT JUDGE